

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In Re:)	Chapter 11
W.R. GRACE & CO., et al.,)	Bankruptcy No. 01-01139 (JKF)
Debtors.)	Jointly Administered
)	

**DECLARATION OF DARRELL W. SCOTT IN SUPPORT OF
ZONOLITE ATTIC INSULATION CLAIMANTS' MEMORANDUM IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY JUDGMENT RE W.R. GRACE'S CONSUMER
PROTECTION LIABILITY**

Darrell W. Scott makes the following declaration:

1 My name is Darrell W. Scott. I am over the age of 18, competent to testify, and provide the following information of my own personal knowledge.

2 Attached hereto as Exhibit "1" is a true and correct copy of the Expert Witness Report by Richard Hatfield and William E. Longo, Ph.D.

3. Attached hereto as Exhibit "2" is a true and correct copy of the Expert Witness Report by Morton Corn, Ph.D.

4. Attached hereto as Exhibit "3" is a true and correct copy of the Expert Witness Report by Dr. Richard J. Lee.

5. Attached hereto as Exhibit "4" is a true and correct copy of an Environmental Protection Agency page entitled "Ask EPA" dated October 15, 2001.

6. Attached hereto as Exhibit "5" is a true and correct copy of the December 28, 1970, Memo from T.A. Bjorklund, "Zonolite Attic Insulation."

7. Attached hereto as Exhibit "6" is a true and correct copy of Grace advertisements.
8. Attached hereto as Exhibit "7" is a true and correct copy of the Grace brochure entitled "Stop the Fuel Thief!"
9. Attached hereto as Exhibit "8" is a true and correct copy of the 1980 Grace data sheet re: Zonolite Attic Insulation.
10. Attached hereto as Exhibit "9" is a true and correct copy of a Grace retail display banner.
11. Attached hereto as Exhibit "10" is a true and correct copy of a Zonolite radio script provided by W.R. Grace.
12. Attached hereto as Exhibit "11" is a true and correct copy of the Grace sales booklet entitled "How You Can Save Up to 40% On Your Home Heating Costs."
13. Attached hereto as Exhibit "12" is a true and correct copy of 1980 Grace ZAI television ad/slide commercial.
14. Attached hereto as Exhibit "13" is a true and correct copy of Excerpts from Deposition of Frederick Eaton, dated February 6, 2003.
15. Attached hereto as Exhibit "14" is a true and correct copy of product packaging from Spokane, Washington, homeowners, Ernest and Doris Matthews.
16. Attached hereto as Exhibit "15" is a true and correct copy of a Grace Memo from P. Kostic to R. W. Sterrett dated March 11, 1969.
17. Attached hereto as Exhibit "16" is a true and correct copy of a Grace Memorandum to H. A. Brown dated April, 1972.
18. Attached hereto as Exhibit "17" is a true and correct copy of a Grace Memo from P. Kostic to R. A. Kulberg dated January 27, 1976.

19. Attached hereto as Exhibit "18" is a true and correct copy of a Grace Memo from B. A. Blessington to B. R. Williams dated March 16, 1977.

20. Attached hereto as Exhibit "19" is a true and correct copy of an internal W.R. Grace, Cambridge Division, Memo dated May 24, 1977, from E. S. Wood to C. E. Brookes, et al. re: Tremolite in Vermiculite.

21. Attached hereto as Exhibit "20" is a true and correct copy of a Grace Memo from B. A. Blessington to distribution list re: Caution Statement on Vermiculite Product Bags dated June 20, 1977.

22. Attached hereto as Exhibit "21" is a true and correct copy of a Grace Memo from O. M. Favorito to E.S. Wood re: Asbestos in Consumer Products dated March 27, 1980.

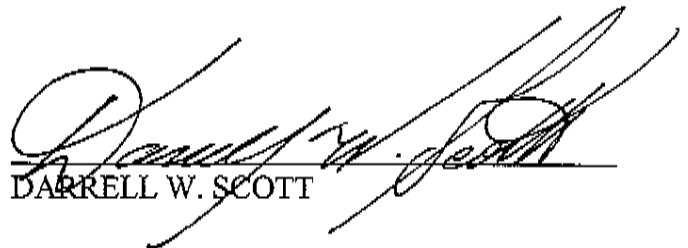
23. Attached hereto as Exhibit "22" is a true and correct copy of the May 17, 1976, R. H. Locke Binder Development Program.

24. Attached hereto as Exhibit "23" is a true and correct copy of the Environmental Protection Agency's Brochure entitled "Current Best Practices for Vermiculite Attic Insulation – May 2003."

25. Attached hereto as Exhibit "24" is a true and correct copy of the deposition of Thomas E. Hamilton, dated February 25, 2003.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 3, 2003.


DARRELL W. SCOTT